

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MELODY M. MARTINEZ :  
Plaintiff : CIVIL ACTION  
v. : NO. 07-3213 - GP  
NEVIN WARNER, et al., :  
Defendants :  
:

**MOTION FOR VOLUNTARY DISMISSAL**

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), respectfully moves this court for a dismissal of any and all claims asserted against all Defendants in the above captioned matter. In support of said motion, Plaintiff declares that:

1. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.
2. Plaintiff and Defendants signed and attached stipulations in support of this motion.
3. Plaintiff and Defendants agree the claims are to be dismissed with prejudice.

**TRIQUETRA LAW**

Dated: November 24, 2008

By: s/Sharon R./López  
**Sharon R. López**  
PA Bar Number: 70605  
Attorneys for Plaintiff  
The Offices at Marion Court  
35 E. Orange Street, Suite 301  
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Dated: November 23, 2008

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MELODY M. MARTINEZ

Plaintiff

v.

NEVIN WARNER, et al.,  
Defendants

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: NO. 07-3213 - GP  
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: JURY TRIAL DEMANDED

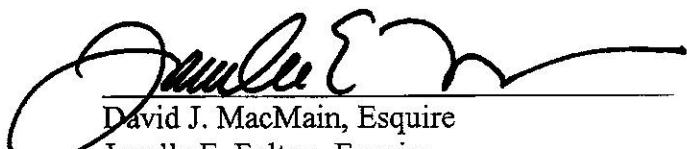
**STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE**

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lancaster County, Nevin Warner, Joseph Schauren, James Hansberry, the Lancaster County Prison Board, and Warden Vincent Guarini with prejudice. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24<sup>th</sup> day of November, 2008.



Sharon R. López, Esquire  
Andrea C. Farney, Esquire  
**TRIQUETRA LAW**  
The Offices at Marion Court  
35 East Orange Street, Suite 301  
Lancaster, PA 17602  
Attorney for Plaintiff



David J. MacMain, Esquire  
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Philadelphia, PA 19109  
Attorney for the Lancaster County Defendants

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MELODY M. MARTINEZ

Plaintiff

v.

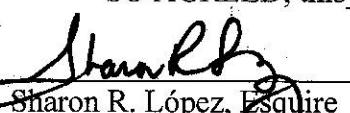
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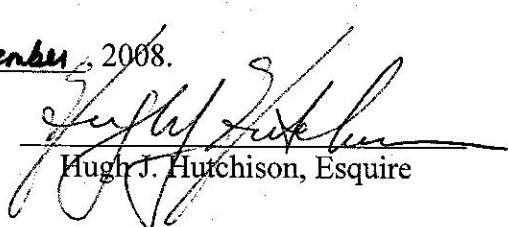
**STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE**

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lebanon County, Defendant Chief Sally Barry, Supervisor Rich Worley, and Probation Officer Jamie Dishong. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24<sup>th</sup> day of November, 2008.

  
\_\_\_\_\_  
Sharon R. López, Esquire  
Andrea C. Farney, Esquire

TRIQUETRA LAW  
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35 East Orange Street, Suite 301  
Lancaster, PA 17602  
Attorney for Plaintiff

  
\_\_\_\_\_  
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Lebanon County Defendants

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MELODY M. MARTINEZ

Plaintiff

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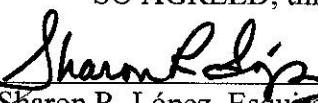
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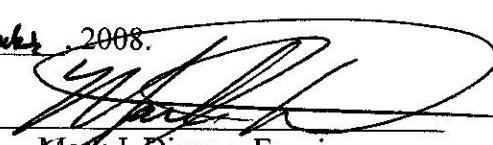
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**STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE**

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lebanon City, Defendant Chief William Harvey, Officer Rissinger, and Sgt. Bord. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24<sup>th</sup> day of November, 2008.

  
Sharon R. Lopez, Esquire  
Andrea C. Farney, Esquire  
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City Defendants